

EXHIBIT E

BRYAN F. AYLSTOCK (FL, AL, MS)*

JUSTIN G. WITKIN (FL, MS)

DOUGLASS A. KREIS (FL)

NEIL D. OVERHOLTZ (FL)

R. JASON RICHARDS (FL, CO)

BOBBY J. "BRAD" BRADFORD (FL, AL)

STEPHEN H. ECHSNER (FL)

*States in which attorney is licensed to practice law

†Of counsel



**Aylstock, Witkin,
Kreis & Overholtz, PLLC**

www.AWKOLAW.com

17 EAST MAIN STREET, SUITE 200 • PENSACOLA, FLORIDA 32502

PHONE: (850) 202-1010 • FAX: (850) 916-7449

D. RENEE BAGGETT (FL)

DANIEL J. THORNBURGH (FL, MN)

NATHAN C. BESS (FL)

E. SAMUEL "SAM" GEISLER (FL, IL)

JAMES D. BARGER (PA, NJ)

ANGEL N. STULL (FL, NY)

CHELSIE R. WARNER (MT, NV)

BEN H. ANDERSON (OH, CA)†

DONNA TAYLOR-KOLIS (OH)†

CHRISTOPHER J. ZIMMERMAN (OH)†

April 30, 2013

VIA E-MAIL

Benjamin M. (Ben) Watson

Butler, Snow, O'Mara, Stevens & Cannada, PLLC

1020 Highland Colony Parkway

Suite 1400

Ridgeland, MS 39158-6010

RE: *In re: Ethicon, Inc. Pelvic Repair System*
Products Liability Litigation MDL No. 2327

Dear Ben:

I am writing in response to your letter of April 23, 2013, regarding ex-US documents.

It is apparent from your letter that you are conflating two issues. Specifically, although we agreed to go forward with your suggestion to conduct a 30(b)(6) deposition, your position that this concession somehow translates into a statement that we do not need the complete production of the documents until that deposition is conducted is totally incorrect. We agreed to the deposition of a 30(b)(6) witness on this issue because you believed that this deposition would help us to understand the burden of producing these documents, particularly the ex-US marketing documents we agreed to table.

At no time, however, did we agree that this deposition would obviate or suspend our legitimate discovery requests for the ex-US documents, other than the specific ones we agreed to carve out in my February 8, 2013, email. We want and are entitled to these documents, and they are relevant to this case. This Court has already ruled as much, and your refusal to produce them timely is interfering with our ability to conduct and to complete depositions in this case.

Please produce these documents as we previously requested (with the exception of those carved out in my February 8, 2013, email), and provide a date certain for the completion of that production, otherwise we will have no choice but to file a motion to compel them in court, and to seek sanctions.

Sincerely,

Bryan Aylstock

cc: Tom Cartmell (via email)
Renee Baggett (via email)
Christy Jones (via email)
Donna Jacobs (via email)